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NORTHERN DISTRICT OF ILLINOIS CLERK, U.S. DISTRICT COURT UNITED STATES DISTRICT COURT EASTERN DIVISION

UNITED STATES OF AMERICA

v.

AHMEL HOLMES. also known as "Melo," and JESUS SANTILLAN. also known as "Gremlin"

Case No. 25 CR 14

Violations: Title 18, United States Code, Sections 111(a) and (b), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), and 2114(a).

> 1:25-cr-00014 Judge Jeremy C. Daniel Magistrate Judge Jeffrey T. Gilbert RANDOM / Cat. 4

COUNT ONE

The SPECIAL MAY 2024 GRAND JURY charges:

On or about January 8, 2025, at Harvey, in the Northern District of Illinois, Eastern Division,

AHMEL HOLMES, also known as "Melo,"

defendant herein, robbed Victim A, a person having lawful charge, custody, and control of property of the United States, namely, United States mail and a United States Postal Service mail tub, and in effecting such robbery, put the life of Victim A in jeopardy by use of a dangerous weapon;

In violation of Title 18, United States Code, Section 2114(a).

COUNT TWO

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about January 8, 2025, at Harvey, in the Northern District of Illinois, Eastern Division,

AHMEL HOLMES, also known as "Melo,"

defendant herein, did use, carry, and brandish a firearm during and in relation to a crime of violence for which defendant may be prosecuted in a court of the United States, namely, robbery of a person having lawful charge, custody, and control of property of the United States, and putting the life of such person in jeopardy by use of a dangerous weapon, in violation of Title 18, United States Code, Section 2114(a), as charged in Count One of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about January 8, 2025, at Harvey, in the Northern District of Illinois, Eastern Division,

JESUS SANTILLAN, also known as "Gremlin,"

defendant herein, did forcibly assault, oppose, resist, oppose, impede, and interfere with Postal Inspectors A and B, officers and employees of the United States Postal Inspection Service, an agency of the United States government, while Postal Inspectors A and B were engaged in the performance of their official duties, and in committing such offense, JESUS SANTILLAN, defendant herein, did use a deadly and dangerous weapon, namely a firearm;

In violation of Title 18, United States Code, Sections 111(a) and (b).

COUNT FOUR

The SPECIAL MAY 2024 GRAND JURY further charges:

On or about January 8, 2025, at Harvey, in the Northern District of Illinois, Eastern Division,

JESUS SANTILLAN, also known as "Gremlin,"

defendant herein, did use, carry, and discharge a firearm during and in relation to a crime of violence for which defendant may be prosecuted in a court of the United States, namely, an assault on Postal Inspectors A and B, officers and employees of the United States Postal Inspection Service, in violation of Title 18, United States Code, Sections 111(a) and (b), as charged in Count Three of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

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FORFEITURE ALLEGATION

The SPECIAL MAY 2024 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code,

Sections 111(a) and (b), 924(c), and 2214(a), as set forth in this Indictment,

defendants shall forfeit to the United States of America any firearm and ammunition:

a. involved in and used in the offense, as provided in Title 18, United

States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession or under the immediate control of the

defendants at the time of arrest, upon conviction of any offense for committing and

attempting to commit any felony involving the use of threats, force, and violence, and

perpetrated in whole or in part by the use of firearms, as provided in 18 U.S.C. § 3665.

2. The property to be forfeited includes, but is not limited to: a Glock 19

nine mm pistol bearing serial number BTNS596 and associated ammunition; a Glock

.40 caliber pistol bearing serial number BTHA654 on its frame and serial number

BSRH881 on its slide and associated ammunition; a KCI .40 caliber 50-round black

and clear plastic drum magazine containing ammunition.

A TRUE BILL:

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FOREPERSON

Signed by Christine O'Neill on behalf of the ACTING UNITED STATES ATTORNEY